

SA:RTP

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

ANTHONY SIMPSON,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

Matthew Vecchio, being duly sworn, deposes and states that he is a Postal Inspector with the United States Postal Inspection Service, duly appointed according to law and acting as such.

On or about Date, within the Eastern District of New York and elsewhere, the defendant ANTHONY SIMPSON did knowingly and unlawfully steal, abstract, and remove mail matter.

(Title 18, United States Code, Section 1708)

The source of your deponent's information and the grounds for his/her belief are as follows:<sup>1</sup>

1. I am a Postal Inspector with the United States Postal Service, Office of Inspector General and have been involved in the investigation of numerous cases involving theft of mail and cargo at John F. Kennedy International Airport ("JFK"). I am familiar with

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

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COMPLAINT

(18 U.S.C. § 1708)

the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file and from reports of other law enforcement officers involved in the investigation.

2. The defendant ANTHONY SIMPSON has been an employee of Swissport, a company that handles ground transportation of mail and cargo within JFK, since approximately July 2001. The defendant drives Swissport cargo transport vehicles and transports mail and cargo between departing and arriving international flights within Terminal 4 and cargo houses located inside the secured perimeter of JFK.

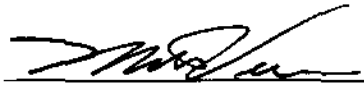
3. Beginning in May 2013, postal inspectors became aware of losses of mail associated with international flights operating out of Terminal 4. The mail from those flights was transported by Swissport ground handlers.

4. I am informed by a confidential source ("CS") that on or about August 28, 2013 the defendant approach the CS within the secured perimeter of JFK and gave CS a black plastic bag containing a men's dress shirt that the defendant said, in sum and substance and in part, was stolen from the cargo on a South African flight. I am further informed that on or about September 19, 2013, the defendant approached the CS within the secured perimeter of JFK and gave CS a white plastic bag containing perfume. I am informed by the CS that on various occasions beginning in 2012 the defendant admitted to the CS, in substance, that the defendant had stolen other cargo during his shift as a Swissport employee at JFK and said to CS, in substance, that CS should attempt to steal items from the mail.

5. On October 30, 2013, the defendant was arrested. He waived his Miranda rights and agreed to speak with law enforcement agents. He stated, in sum and

substance and in part, that he has previously opened mail trays from flights and stolen jeans, tennis shoes, perfume and other clothing items from the mail.

WHEREFORE, your deponent respectfully requests that the defendant  
~~ANTHONY SIMPSON~~  
~~CLAIRMONT KING~~, be dealt with according to law.



Matthew Vecchio  
Postal Inspector, United States Postal Service,  
Office of Inspector General

Sworn to before me this  
31st day of Month, Year



THE HC  
UNITED  
EASTERN

S/Bloom

UDGE

OF NEW YORK